



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

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BY ECF

The Honorable Douglas E. Arpert
United States Magistrate Judge
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 07102

Re: *State of New Jersey v. U.S. Department of Education*,
No. 19-CV-18036 (BRM)(DEA)

Dear Judge Arpert:

I am the Assistant United States Attorney representing the U.S. Department of Education in the above matter, a suit brought by the State of New Jersey under the Freedom of Information Act. I write respectfully, on behalf of all parties, to request a 30-day adjournment of the initial conference (which is set for February 13, 2020) and the date by which the parties must submit a joint discovery plan (February 4, 2020). We make this request because the additional time would allow the Department of Education to complete its response to the plaintiff's FOIA request and give the parties an opportunity to see whether they can resolve or limit the issues in this case.

This is the parties' first request for an adjournment of the initial conference and the time to submit a joint discovery plan. I have spoken with counsel for the plaintiff, Glenn Moramarco, Esq., and he joins in this request.

Thank you very much for considering this request.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

By: s/ Kristin L. Vassallo
KRISTIN L. VASSALLO
Assistant United States Attorney

cc: Glenn Moramarco, Esq. (By ECF)